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April 22, 2025

VIA HAND DELIVERY

The Honorable Gregory B. Williams
District Court Judge
J. Caleb Boggs Federal Building
844 N. King St., Unit 26, Room 6124
Wilmington, DE 19801

**Re: *TMC Acquisition, LLC d/b/a Tailor Made Compounding v.
Coalition for Responsible Compounding LLC, et al.,
C.A. No. 24-852-GBW***

Dear Judge Williams:

My office represents Plaintiff, TMC Acquisition, LLC d/b/a Tailor Made Compounding, in the above-referenced matter. Currently pending before the Court are Defendants' Motion to Dismiss for Improper Venue and for Lack of Personal Jurisdiction (D.I. 11), and Plaintiff's Motion for Discovery as to Jurisdiction (D.I. 17) (collectively, the "Motions"). We write to advise the Court of a recent ruling that may be pertinent to resolution of the pending Motions.

Specifically, we are aware that claims similar to those raised by Plaintiff have been asserted by another entity against Defendants, Coalition for Responsible Compounding LLC (the "Coalition") and Shaun Noorian, in the Superior Court of the State of Delaware. *See Farmakeio Outsourcing, LLC v. Coalition for Responsible Coumpound LLC, et al.*, Del. Super., C.A. No. N24C-05-327 MAA.



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The Coalition and Mr. Noorian are represented by the same counsel in that case. As in this case, the Coalition and Mr. Noorian filed a motion to dismiss in the Superior Court action. That motion was recently denied. Plaintiff has now obtained a transcript of the Superior Court decision, which is enclosed herewith.

Plaintiff does not intend to suggest that Defendants' arguments in each case are identical. However, Defendants do wish to bring the decision to the Court's attention should Your Honor request additional briefing or input from the parties concerning its significance with respect to resolution of the pending Motions.

We remain available at the convenience of the Court should Your Honor have any questions or concerns.

Respectfully submitted,

/s/ Alexandra D. Rogin

Alexandra D. Rogin (DE Bar No. 6197)

ADR/
Encl.